

# **Exhibit A**

## DISCOVERY PLAN WORKSHEET

### Phase I (Pre-Settlement Discovery)

<b>Deadline for completion of Rule 26(a) initial disclosures and any HIPAA-complaint records authorizations:</b>	Rule 26(a) disclosures: 12/4/20 HIPAA: 12/28/20
<b>Completion date for Phase I Discovery as agreed upon by the parties:</b> <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	2/9/21
<b>Date for initial settlement conference:</b> <i>(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)</i>	2/24/21

### Phase II (Discovery and Motion Practice)

<b>Motion to join new parties or amend the pleadings:</b> <i>(Presumptively 15 days post initial settlement conference)</i>	3/9/21
<b>First requests for production of documents and for interrogatories due by:</b> <i>(Presumptively 15 days post joining/amending)</i>	3/24/21
<b>All fact discovery completed by:</b> <i>(Presumptively 3.5 months post first requests for documents/interrogatories)</i>	End of fact depositions: 7/3/21 End of fact discovery: 7/10/21
<b>Exchange of expert reports completed by:</b> <i>(Presumptively 30 days post fact discovery)</i>	Plaint. expert rpts.: 9/10/21 Def. expert rpts.: 11/30/21
<b>Expert depositions completed by:</b> <i>(Presumptively 30 days post expert reports)</i>	1/30/22
<b>COMPLETION OF ALL DISCOVERY BY:</b> <i>(Presumptively 9 months after Initial Conference)</i>	1/30/22
<b>Final date to take first step in dispositive motion practice:</b> <i>(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)</i>	3/2/22
<b>Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?</b>	No